

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

THE UNITED STATES OF AMERICA

vs.

CASE NO. 3: 99CR00315-29 (DRD)

JONATHAN CONCEPCION-VILLANUEVA

* * * * *

**MOTION NOTIFYING SUPERVISED RELEASE VIOLATIONS
AND REQUESTING THE ISSUANCE OF AN ARREST WARRANT**

**TO THE HONORABLE DANIEL R. DOMINGUEZ
UNITED STATES DISTRICT JUDGE
DISTRICT OF PUERTO RICO**

COMES NOW, Benjamín Bonilla, United States Probation Officer of this Court, respectfully presenting an official report on the conduct and attitude of the offender, Jonathan Concepción-Villanueva, who on February 8, 2002, was sentenced by Your Honor to seventy (70) months of imprisonment after he pled guilty of violating Title 21, U.S. Code, § 846. A five (5) year supervised release term and a special monetary assessment in the amount of \$100.00 were also imposed. On March 8, 2007, Mr. Concepción-Villanueva was released from custody at which time he commenced his supervised release term.

RESPECTFULLY PRESENTING PETITION FOR ACTION OF COURT AS FOLLOWS:

Since his release from custody, the offender has violated the following conditions of his supervised release term:

1. STANDARD CONDITION - "WHILE ON SUPERVISED RELEASE, THE DEFENDANT SHALL NOT COMMIT ANOTHER FEDERAL, STATE, OR LOCAL CRIME. THE DEFENDANT SHALL NOT ILLEGALLY POSSESS A CONTROL SUBSTANCE.

On June 12, 2007, Mr. Concepción-Villanueva was arrested by Puerto Rico Police, Tactical Operations Division Agents of Aguadilla. He was in possession of one-hundred (100) small plastic

bags containing marihuana, nineteen (19) small plastic bags containing cocaine and seven hundred and sixty seven (\$767) dollars, as confirmed by Noel Pérez-Crespo (Badge #20890), the arresting agent. Probable cause for his arrest was found and a preliminary hearing was scheduled for June 27, 2007. Mr. Concepción-Villanueva was released on a \$20,000 bond on that same day. On June 16, 2007, this officer received a call from Puerto Rico Police, Tactical Operations Division Agent Héctor Cabán-González (Badge #13507) indicating that he had arrested Mr. Concepción-Villanueva, once again, in possession of eight (8) small plastic bags containing cocaine and one hundred and ninety six (\$196) dollars. As he indicated, Mr. Concepción-Villanueva was released on personal recognizance and was instructed to report to the Aguadilla District Court on June 25, 2007, for arraignment.

WHEREFORE, I declare under penalty of perjury that the forgoing is true and correct. In view of the aforementioned, it is respectfully requested that his term of supervision be tolled and a warrant for his arrest be issued so that he may be brought before this Honorable Court to show cause why his supervision term should not be revoked. Thereupon, he to be dealt with pursuant to law.

In San Juan, Puerto Rico, this 18th day of June 2007.

Respectfully submitted,

EUSTAQUIO BABILONIA, CHIEF
U.S. PROBATION OFFICER

s/Benjamin Bonilla
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CERTIFICATE OF SERVICE

I HEREBY certify that on June 18, 2007, I electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Jose A. Ruiz, Assistant U.S. Attorney and to Olga M. Sheppard, Esq..

In San Juan, Puerto Rico, this 18th day of June 2007.

s/Benjamin Bonilla
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